

EXHIBIT I

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT) MDL Number:
ADDICTION/PERSONAL INJURY PRODUCTS) 4:22-MD-C047-YGR
LIABILITY LITIGATION)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
SPRING STREET COURTHOUSE

COORDINATION PROCEEDING)
SPECIAL TITLE [RULE 3.400])
SOCIAL MEDIA CASES) Lead Case No. for
Filing Purposes
22STCV21355

This Document Relates to:

STATE OF TENNESSEE,
ex rel. JONATHAN SKRMETTI,
ATTORNEY GENERAL and REPORTER,
v.
META PLATFORMS, INC., and
INSTAGRAM, LLC,
Case No. 23-1364-IV

Confidential - Pursuant to Protective Order
VIDEOTAPED DEPOSITION of [REDACTED], PhD
Palo Alto, California
November 19, 2024

Job No. 6933449
Pages 1 - 418
Stenographically reported by:
JENNY L. GRIFFIN, RMR, CSR, CRR, CCRR, CRC
CSR No. 3969

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1 you?

2 A. I do, yes.

3 Q. Okay. And backing up just a bit, I think
4 we established that [REDACTED] had asked you a question
5 about whether the BEEF survey had a question on harm
6 felt from bullying.

7 Do you remember that?

8 A. Yes.

9 Q. Okay. And you respond in this chat asking
10 if she means the intensity question; right?

11 A. Yes. We didn't have a question that was --
12 specifically said "harm," but I offered up the
13 intensity question as similar.

14 Q. And by that, you meant was there a question
15 on the BEEF survey about how bad did this make you
16 feel, right, to a user?

17 A. Yes.

18 Q. Okay. And do you see the sentence that
19 starts:

20 "BEEF asked a question about
21 emotional impact, but I was told I need
22 to delete that data. We can't analyze
23 it."

24 A. Yes.

25 Q. And you communicated that to [REDACTED]?

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1 A. I did.

2 Q. Okay. And [REDACTED]'s response is:

3 "Perhaps I can give it a try?"

4 A. Yes.

5 Q. And what is your response there?

6 A. I said:

7 "No. For policy/legal reasons, I
8 was told we need to delete the data and
9 not analyze."

10 Q. And can you read the next line as well,
11 please?

12 A. Yes. I then say:

13 "We're not allowed to ask about
14 emotions in surveys anymore."

15 Q. Okay. Who told you you had to delete data
16 about emotional impact?

17 MR. HALPERIN: I'll just caution the
18 witness to the extent that information came from a
19 lawyer, not to disclose any privileged
20 communications you may have had.

21 THE WITNESS: I don't remember anyway.

22 BY MS. BAIG:

23 Q. You don't remember who told you?

24 A. No.

25 Q. Do you remember whether you deleted the

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1 information?

2 A. I should have. I don't remember what I did
3 with the dataset.

4 Q. Okay. So do you know -- so it says here
5 you were told you needed to delete the data and not
6 analyze; correct?

7 A. Yes.

8 Q. Okay. And you don't recall whether you
9 did, in fact, delete it?

10 MR. HALPERIN: Asked and answered.

11 THE WITNESS: I don't remember, but I
12 assume I did if I -- if I say that I was told to do
13 it.

14 BY MS. BAIG:

15 Q. Okay. And do you know -- did you keep a
16 copy of it?

17 A. No. I would have had the -- in our survey
18 system, because it's an online -- we're on a
19 platform survey. I would have downloaded the data
20 from, you know, the system onto, you know, like a
21 spreadsheet and then analyzed the data there. And
22 so I would have deleted it on kind of my copy.

23 Q. Okay. And so it would have remained on the
24 system; is that right?

25 A. I know there's, like, a retention -- so